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Office of the Chief Counsel
Rules Docket Office (Docket #29547)
Federal Aviation Administration
800 Independence Ave., SW.
Room 915-G
Washington, DC 20591

Subject: **207-Minute** Extended Range Operations with Twin-Engine Aircraft
ETOPS Operation Approval Criteria (Docket #29547)

To Whom It May Concern:

The Association of Asia Pacific Airlines (**AAPA**) submits these comments on behalf of its member carriers in regard to the above issue. We appreciate the opportunity to comment, and your consideration of our views.

As background, **AAPA** is the trade association representing nineteen major air carriers based in the Asia Pacific region.¹ The organization was founded in 1966 to provide a forum for examining international air transport issues and for developing action plans on matters of mutual concern. Safety and security of airline passengers, crew, and aircraft remain of the utmost importance to **AAPA** and its members.

AAPA member carriers do not currently have a need for **207-minute ETOPS** operation criteria based on their fleet composition and route network structures. However, our member carriers believe that an extension of current **180-minute ETOPS** operating requirements by 15%, if accomplished with appropriate safety review and criteria development, is a reasonable and appropriate step forward for the industry.

¹ **AAPA** members include Air New Zealand, Air Niugini, All Nippon Airways, Ansett Australia, Asiana Airlines, Cathay Pacific Airways, China Airlines, EVA Airways, Dragonair, Garuda Indonesia, Japan Airlines, Korean Air, Malaysia Airlines, Philippine Airlines, Qantas Airways, Royal Brunei Airlines, Singapore Airlines, Thai Airways International, and Vietnam Airlines.

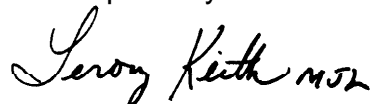
Our member carriers would not oppose the introduction of **207-minute** approval criteria by the FAA, insomuch as we are convinced that the FAA will:

1. Undertake a thorough and proper analysis of the additional risks involved, and
2. Ensure that new criteria or requirements associated with the **207-minute ETOPS** authority would not be applied retroactively to current **180-minute** approvals.

Five **AAPA** members have expressed support for the Air Transport Association's request as published in the Federal Register on **27 April 1999**, with the condition that consideration is given to the two concerns listed above. These members are EVA Air, Singapore Airlines, Malaysia Airlines, **Ansett** Australia, and **QANTAS**. Additionally, Air New Zealand expresses support for the concept of **207-minute ETOPS** approval authority criteria, but disagrees with the requirement for **RFFS** Category 7 at the **ETOPS** en route field. Instead, Air New Zealand believes that the required **RFFS** category should remain at Category 4 pending a more comprehensive review and clarification of **RFFS** for en route airfields. Thai Airways and Royal Brunei also provided input on this issue and did not express objections, although **207-minute ETOPS** is not likely to be an issue of concern for these member carriers in the near future.

We are grateful for the opportunity to comment on this issue, and look forward to continuing contributions to FAA development of **207-minute ETOPS** approval criteria.

Respectfully submitted,

A handwritten signature in black ink that reads "Leroy Keith" followed by a stylized monogram or initials.

Leroy Keith
Technical Director
Association of Asia Pacific Airlines

cc: Mr. Eric van **Opstal**
Air Transportation Division (**AFS-200**)
Federal Aviation Administration

Mr. Jon Ash
Dr. Melissa **Loughlin**
Global Aviation Associates, Ltd.